

**Forest Management and Stump-to-Forest Gate Chain-of-Custody
Scoping Report for the:**

Indiana Classified Forests Group Certification

**Conducted under auspices of the SCS Forest Conservation Program
SCS is an FSC Accredited Certification Body**

Submitted to:

**Indiana Department of Natural Resources
Division of Forestry**

Lead Author: Sterling Griffin

Date of Field Audit: 5/22-5/23/2008

Date of Report: 7/23/2008

**SCIENTIFIC CERTIFICATION SYSTEMS
2200 Powell St. Suite Number 725
Emeryville, CA 94608, USA
www.scscertified.com**

SCS Contact: Dave Wager dwager@scscertified.com

1.0 Introduction

The IN Division of Forestry (DOF) retained Scientific Certification Systems to provide detailed information about the feasibility of achieving third-party certification of its Classified Forest Program. Certification of forest management programs by independent, third parties has become increasingly common world-wide for a variety of reasons. Certification provides assurance to customers, managers, landowners, and the general public that objective standards are being met in the management of forests. Certification also helps land managers understand how their programs and practices compare with other organizations and helps these managers improve their forestry and conservation practices.

Scientific Certification Systems (SCS) of Emeryville, California conducted a FSC Preliminary Evaluation of DOF in May, 2008. This report summarizes the findings of the assessment.

Format Used to Address Assessment Issues

Preliminary evaluations are a standard first step in the FSC-endorsed certification process and are designed to afford insight to a forest management entity as to general areas of strength and weakness relative to the standards of certification. The results of a preliminary evaluation will enable forest managers to better prepare for seeking FSC-endorsed certification.

2.0 Evaluation Process

2.1 Assessment Dates

The on-site portion of the field assessment occurred from May 22-23, 2008.

2.2 Assessment Team

A one person audit team was used for the preliminary evaluation.

Sterling Griffin, RPF #2805: Sterling Griffin is a Senior Certification Forester with Scientific Certification Systems. He is a Registered Professional Forester in the State of California with 10 years professional experience in private and public forest management. He is a graduate of Purdue University with a B.S in Forestry and has conducted Forest Stewardship Council (FSC) endorsed assessments on over 6 million acres of forestland in North and South America. Recent FSC assessments have included public lands administered by Fort Lewis, WA Forestry Branch, Michigan DNR, Indiana DOF, New York DEC, Maryland DNR and numerous private operations in Maine, Pennsylvania, Oregon, Washington, and California. Prior to joining SCS, he was the founder of a private consulting firm in Northern California specializing in sustained yield management, fuels reduction, and forest health management. His professional career also includes silvicultural and ecosystem research for the U.S. Forest Service. Areas of research activities include stand level response to vegetative competition and Long-Term Ecosystem Productivity (LTEP) in the Pacific Northwest.

2.3 Assessment Process

The auditor reviewed management system documents and conducted a field visit to witness management system implementation. The on-site portion of the scoping visit included an opening meeting in the Indianapolis DOF offices with presentations by key staff related to the Classified Forest Program. Staff present included Jack Seifert, State Forester; Dan Ernst, Assistant State Forester; Carl Hauser, Properties Program Specialist; Brenda Hofer, Forest Stewardship Coordinator; Charles Ratts, District Forester; Gary Langell, Private Lands Program Manager F & W; Cloyce Hedge, Division of Nature Preserves, and L Arieno, Archaeologist.

The field visit included visits to three properties enrolled in the Classified Forest Program. The properties include two owned by Al Meyer and one owned by Gene Suding. The sites visited included a plantation established on pasture land and two sites that had recently been harvested. The harvested sites both contained watercourse crossings and road maintenance. Both harvests were done as selective cuttings (CF lands must retain at least 40 ft² of Basal area or 1,000 trees/acre, *IC 6-1.1-6-3*).

Following the on-site portion of the assessment, the FSC lead auditor spent time reviewing DoF documents and preparing a preliminary assessment report.

2.4 Stakeholder Consultation

During the course of the two day on-site audit in May, the auditor had the opportunity to meet and talk with key DoF employees and CF landowners.

3.0 Evaluation Findings

To follow are the SCS auditor's findings, presented in two formats:

- A general overview of gaps relative to the FSC standards.
- Specific comments relative to the more detailed *indicators and verifiers* constituting the **FSC Lake States-Central Hardwood Regional Standard**.

The reader is reminded that preliminary evaluations, by their very nature, are not definitive determinations of the degree of conformance to the certification standard. Only a full certification evaluation, conducted under the auspices of the FSC and according to FSC protocols, will generate definitive determinations of conformance. The results of preliminary evaluations constitute findings as to the likelihood that the candidate forest management operation would be found in conformance to the standard, were a full evaluation to be conducted.

In instances where possible non-conformances or “gaps” are identified and discussed in this report, we recommend that DOF pursue a combination of the following responses, between now and the time of a full evaluation:

- In the event that DOF believes that an identified gap, in fact does not exist despite the findings of the preliminary evaluation team, compile additional information and evidence to submit to the full evaluation team—on or before the conduct of the full evaluation—that better demonstrates how DOF is conforming to the particular criterion or indicator.
- Formulate, and implement as far as possible, corrective actions aimed at closing the identified gaps.

3.1 Gap Analysis

Based upon the information gathered and preliminary judgments formed from document reviews, personal interviews and field inspections, it is the SCS audit team’s general sense that DOF is reasonably well positioned to achieve FSC-endorsed certification. Several of the identified gaps are of a more substantive nature that have the potential to arise as pre-conditions to certification. The specific requirement and SCS assessment of performance is detailed in the Lake States Regional Standard conformance table (section 3.2 of this report). DOF can improve their likelihood of achieving FSC certification by addressing or making a commitment to address the following areas, prior to the full assessment:

- Indicator 1.1.b – Some operations may not be in compliance with state BMPs.
- Indicator 1.4.a – DOF must determine if there are conflicts between state confidentiality laws and the FSC P&C
- Criterion 1.5 – Each landowner must demonstrate commitment to the FSC
- Indicator 1.6.6 – When landowners enroll only a portion of their lands in the program, DOF must establish that controversial activities (see partial certification guidelines) are not occurring on non-enrolled acres.
- Indicator 3.3.a - Areas of significant cultural, historic, and/or religious value must be identified and protected
- Indicator 4.2.a – Viewpoints of affected stakeholders must be solicited and recorded. Valid concerns must be addressed in policies and procedures
- Criterion 5.6 – The rate of annual harvest must not exceed sustainable levels. Harvest records may need to be retained and compared against inventory growth estimates.
- Indicator 6.1.a - Assessments of current conditions in management plans must include listed species, rare communities, and water resources
- Indicator 6.2.a – District foresters may need training to identify R/TE species
- Indicator 6.3.b.3 – There may be limited procedures in place that would prevent “high-grading” and ensure consistent scientific methods for selecting trees to be harvested on group members lands.

- Indicator 6.3.c – Landowners may need to be better informed about the need to retain biological legacies including “wildlife trees” with cavities, bark fissures, forked tops, etc., snags, and downed logs.
- Indicator 6.3.c.4 – Salvage guidelines are not included in management plans.
- Indicator 6.6.a – DOF must be able to provide reasonable level of assurances that chemicals on the FSC Highly Hazardous list are not used
- Criterion 7.4 – DOF must ensure management plan summaries are available upon request by the public
- Indicator 8.2.a.1 – DOF may need to further refine the inventory approach used to describe forest properties. Stands may need to be better classified by forest type and reference the stratified inventory estimates used for the program. This reference should be included in the management plan. Additionally, an assessment may need to be done to ensure enough FIA plots are established within each region and forest type, etc (strata).
- Criterion 8.3 - DOF must develop Chain-of-Custody procedures
- Principle 9 – DOF may need to conduct programmatic assessments for HCVF or otherwise ensure HCVF are identified and maintained on group members lands
- Group Management Guidelines – DOF must develop a FSC “group management policies and procedures manual” that defines roles and responsibilities, etc.